

EXHIBIT B

CeCe Cole

From: Benjamin Halperin <BHalperin@cdas.com>
Sent: Thursday, February 16, 2023 5:13 PM
To: Mark Passin
Cc: Lance Koonce; Paul V. LiCalsi - Reitler Kailas & Rosenblatt LLC (plicalsi@reitlerlaw.com); Van Benthysen, Brett; Zach Press; Nancy Wolff; CeCe Cole
Subject: Re: Deposition scheduling

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Thanks Mark. The below schedule works for the CDAS defendants; defer to Lance about the prospect witnesses

Sent from my iPhone

On Feb 16, 2023, at 2:48 PM, Mark Passin <mark@csrlawyers.com> wrote:

External Email

Dear All,

How is the below deposition schedule?. If possible, I would like to move Kim to March 16. Please let me know. As for Van Stowe, we included her because you listed her in your initial disclosures. As for her and Brescia, I cannot promise that I will be done in a half of a day, but I will try to complete her and Stouwe's depositions expeditiously. You listed both of them in your initial disclosures and produced documents from both of them as well. However, please be advised that I will expect all witnesses to available, if necessary, for the full 7 hours.

Best regards.

March 2023

Monday	Tuesday	Wednesday	Thursday	Friday
				3. Stacy Abrams (Zoom)
6.	7. Tracy Wolff (Austin)		9. Liz Pelletier (Austin)	10.
13. Emily Kim (NY)	14. Entangled 30(b)(6) (NY)	15. Macmillan (NY)	16.	17.
20.	21. Trent Baer (Zoom)	22.	23. Universal (CA)	24. Lynne Freeman (CA)
27. Mary McCauley (zoom)	28.	29. Carrie Pestritto (Zoom)	30. Lynn Van Stouwe (Zoom)	31. Ellen Bescia (Zoom)

From: Lance Koonce <lance.koonce@klarislaw.com>
Sent: Friday, February 10, 2023 1:57 PM
To: Mark Passin <mark@csrlawyers.com>; Benjamin Halperin <BHalperin@cdas.com>
Cc: Paul V. LiCalsi - Reitler Kailas & Rosenblatt LLC (plicalsi@reitlerlaw.com) <plicalsi@reitlerlaw.com>; Van Benthysen, Brett <bvanbenthysen@reitlerlaw.com>; Zach Press <zach.press@klarislaw.com>; Nancy Wolff <NWolff@cdas.com>; CeCe Cole <CCole@cdas.com>
Subject: RE: Deposition scheduling

Hi Mark: I can't speak for Entangled. As to the witnesses you asked to move to the last week of March, Lynn Vande Stouwe can do the 28-30. However, it's not clear to us why you need her, given that she was only at Prospect from January 1, 2019 to April 23, 2019. We can discuss this on Monday.

Can you let me know how long you will need with Carrie Pestritto and Ellen Brescia? With respect to Ellen, it looks like she has more flexibility the week of March 27 if you only anticipate a half-day with her.

I would note that we are contemplating much of this shuffling primarily to accommodate the fact that you would prefer not to have depositions on back-to-back days. At some point, that may just become unavoidable, though.

From: Mark Passin <mark@csrlawyers.com>
Sent: Thursday, February 9, 2023 8:46 PM
To: Lance Koonce <lance.koonce@klarislaw.com>; Benjamin Halperin <BHalperin@cdas.com>
Cc: Paul V. LiCalsi - Reitler Kailas & Rosenblatt LLC (plicalsi@reitlerlaw.com) <plicalsi@reitlerlaw.com>; Van Benthysen, Brett <bvanbenthysen@reitlerlaw.com>; Zach Press <zach.press@klarislaw.com>; Nancy Wolff <NWolff@cdas.com>; CeCe Cole <CCole@cdas.com>
Subject: RE: Deposition scheduling

Lance,

I left out that if we cannot move Emily what about moving Entangled to May 16?

From: Mark Passin
Sent: Thursday, February 9, 2023 5:35 PM
To: Lance Koonce <lance.koonce@klarislaw.com>; Benjamin Halperin <BHalperin@cdas.com>
Cc: Paul V. LiCalsi - Reitler Kailas & Rosenblatt LLC (plicalsi@reitlerlaw.com) <plicalsi@reitlerlaw.com>; Van Benthysen, Brett <bvanbenthysen@reitlerlaw.com>; Zach Press <zach.press@klarislaw.com>; Nancy Wolff <NWolff@cdas.com>; CeCe Cole <CCole@cdas.com>
Subject: RE: Deposition scheduling

Lance and Ben,

Are you also ok with moving McCauley to the week of March 27? If so, I will verify that she is available that week.

I believe that we need to get the Magistrate's permission to take depositions after the cut-off. I do not understand your reluctance to do so. If you do not want to do a joint letter, I will have to send a unilateral letter. What should I say is your position?

At the same time, I also want to ask her to move the February 17 deadline to make discovery motions. It was March 15, 2023 and I have relied on that deadline. Moreover, I served document requests for which the responses are due after February 17, 2023 and we are taking depositions after that deadline. Are you agreeable with moving the deadline to a week after we finish the depositions.

Lance, we had agreed to meet and confer on Monday regarding your request to withdraw the fourth set of document requests.

Best regards.

From: Lance Koonce <lance.koonce@klarislaw.com>
Sent: Thursday, February 9, 2023 4:20 PM
To: Mark Passin <mark@csrlawyers.com>; Benjamin Halperin <BHalperin@cdas.com>
Cc: Paul V. LiCalsi - Reitler Kailas & Rosenblatt LLC (plicalsi@reitlerlaw.com) <plicalsi@reitlerlaw.com>; Van Benthysen, Brett <bvanbenthysen@reitlerlaw.com>; Zach Press <zach.press@klarislaw.com>; Nancy Wolff <NWolff@cdas.com>; CeCe Cole <CCole@cdas.com>
Subject: RE: Deposition scheduling

Mark:

Ms. Kim is ok for the 13th, but not the 17th. We are looking into moving Van Stouwe and Brescia to the week of March 27, but I don't have answers yet on that – will hopefully know tomorrow.

I agree with Ben that a joint letter to the magistrate for permission is unnecessary here.

I'm still awaiting your answer as to whether Plaintiff will withdraw the fourth set of document requests to my clients, in light of the judge's statements that I pointed out to you from the last hearing.

Lance

From: Mark Passin <mark@csrlawyers.com>
Sent: Wednesday, February 8, 2023 10:25 PM
To: Benjamin Halperin <BHalperin@cdas.com>
Cc: Paul V. LiCalsi - Reitler Kailas & Rosenblatt LLC (plicalsi@reitlerlaw.com) <plicalsi@reitlerlaw.com>; Van Benthysen, Brett <bvanbenthysen@reitlerlaw.com>; Lance Koonce <lance.koonce@klarislaw.com>; Zach Press <zach.press@klarislaw.com>; Nancy Wolff <NWolff@cdas.com>; CeCe Cole <CCole@cdas.com>
Subject: RE: Deposition scheduling

Ben,

Thanks for the e-mail.

If we are going to go beyond March 15, which is fine with me, I would want to get the Magistrate's permission via a joint letter to her.

The problem with the below is it is too compact. Can we move Van Stouwe to the week of March 27. Maybe we could also take Brescia that week. I would also want to move McCauley to that week, but would have to check her availability I would want to spread the three depositions out so that we use Monday, Wednesday and Friday of that week. Lastly, can we move Kim to March 17.

Lance, can you please let me know also.

Thanks.

From: Benjamin Halperin <BHalperin@cdas.com>

Sent: Wednesday, February 8, 2023 7:51 AM

To: Mark Passin <mark@csrlawyers.com>

Cc: Paul V. LiCalsi - Reitler Kailas & Rosenblatt LLC (<plicalsi@reitlerlaw.com> <plicalsi@reitlerlaw.com>; Van Benthysen, Brett <bvanbenthysen@reitlerlaw.com>; Lance Koonce <lance.koonce@klarislaw.com>; Zach Press <zach.press@klarislaw.com>; Nancy Wolff <NWolff@cdas.com>; CeCe Cole <CCole@cdas.com>

Subject: Re: Deposition scheduling

Mark, the Entangled Defendants propose the below revised schedule in an effort to accommodate both your schedule and ours. This schedule does not include a date for Ellen Brescia but hopefully you and Lance can work that one out.

Defendants believe that Judge Netburn's latest order allows for some depositions in the second half of March and that we don't need to get her permission to hold a few of them then. However, all other fact discovery ends March 15 as ordered.

Please confirm whether this schedule works.

March 2023

Monday	Tuesday	Wednesday	Thursday	Friday
		1. Carrie Pestritto (Zoom)	2. Lynn Van Stouwe (Zoom)	3. Stacy Abrams (Zoom)
6.	7. Tracy Wolff (Austin)	8. Mary McCauley (Zoom)	9. Liz Pelletier (Austin)	10.
13. Emily Kim (NY)	14. Entangled 30(b)(6) (NY)	15. Macmillan (NY)	16.	17.
20.	21. Trent Baer (Zoom)	22.	23. Universal (CA)	24. Lynne Freeman (CA)
27.	28.	29.	30.	31.

From: Mark Passin <mark@csrlawyers.com>

Date: Monday, February 6, 2023 at 7:49 PM

To: Benjamin Halperin <BHalperin@cdas.com>

Cc: Paul V. LiCalsi - Reitler Kailas & Rosenblatt LLC (<plicalsi@reitlerlaw.com> <plicalsi@reitlerlaw.com>, Van Benthysen, Brett <bvanbenthysen@reitlerlaw.com>, Lance Koonce <lance.koonce@klarislaw.com>, Zach Press <zach.press@klarislaw.com>, Nancy Wolff <NWolff@cdas.com>, CeCe Cole <CCole@cdas.com>

Subject: RE: Deposition scheduling

External Email

Ben,

[REDACTED]

Thus, she is not available in February. I suggest that we set the following schedule and ask the magistrate to continue the cut-off for 8 days to allow us to do so. It also makes the schedule a little more spread out. Can this work for you?

- | | | |
|------------------|------------------|---|
| 1. February 22 | Ellen Brescia | Zoom |
| 2. February 24 | Lynn Van Stouwe | Zoom |
| 3. March 1 | Carrie Pestritto | Zoom |
| 4. March 3 | Stacy Abrams | Zoom |
| 5. March 6 | Wolff | Austin |
| 6. March 9 | Pelletier | Austin |
| 7. March 8 or 10 | Mary | Zoom [We prefer the 10 th , but were not sure if Pelletier or one of the lawyers was not available on March 10.] |
| 8. March 13 | Kim | New York |
| 9. March 14 | Entangled | New York |
| 10. March 15 | Macmillan | New York |
| 11. March 18 | Trent Bear | Los Angeles |
| 12. March 21 | Lynne Freeman | Los Angeles |
| 13. March 23 | Universal | Los Angeles |

From: Benjamin Halperin <BHalperin@cdas.com>

Sent: Monday, February 6, 2023 12:08 PM

To: Mark Passin <mark@csrlawyers.com>

Cc: Paul V. LiCalsi - Reitler Kailas & Rosenblatt LLC (<plicalsi@reitlerlaw.com>); Van Benthysen, Brett <bvanbenthysen@reitlerlaw.com>; Lance Koonce <lance.koonce@klarislaw.com>; Zach Press <zach.press@klarislaw.com>; Nancy Wolff <NWolff@cdas.com>; CeCe Cole <CCole@cdas.com>

Subject: Re: Deposition scheduling

Following up further, I can confirm that Pelletier is available on March 9 in Austin if you can move her to that day. Also, to hopefully make things easier for you, if you are intending to depose the person at Entangled most knowledgeable about their revenues and expenses, that person is Peter DeGiglio, and he is available March 14 in NYC.

From: Benjamin Halperin <BHalperin@cdas.com>
Date: Monday, February 6, 2023 at 1:23 PM
To: Mark Passin <mark@csrlawyers.com>
Cc: Paul V. LiCalsi - Reitler Kailas & Rosenblatt LLC (plicalsi@reitlerlaw.com)
<plicalsi@reitlerlaw.com>, Van Benthysen, Brett <bvanbenthysen@reitlerlaw.com>, Lance Koonce <lance.koonce@klarislaw.com>, Zach Press <zach.press@klarislaw.com>, Nancy Wolff <NWolff@cdas.com>, CeCe Cole <CCole@cdas.com>
Subject: Re: Deposition scheduling

Mark, hope you had a nice weekend. Following up on deposition scheduling.

Not every aspect of the schedule you proposed works for Defendants, but we are conferring with our clients and trying to make much of it work. Right now I can confirm the following: Abrams March 3, Wolff March 6, Baer March 7, Macmillan March 15.

We were surprised to see you potentially withdraw your prior offer to have Plaintiff be deposed in Austin. Can you please clarify the reason for that? If you insist on having that depo be in California, could we do it Feb 28 (assuming Feb 27 works for Universal), so that we do not have to travel to California twice? Otherwise we will ask Plaintiff to pay for our travel/accommodations if a separate trip to California is required. Plaintiff cannot file a lawsuit in New York and require Defendants to bear the cost of going to California to depose her.

Also, March 10 does not work for us. Can you take Pelletier on March 8 or 9 in Austin instead? You have "Entangled" listed on March 8. Do you mean that you want to take a 30(b)(6) of the person at Entangled most knowledgeable about financial issues? If so, that individual is located in New York, not Austin, and is likely not available the week of March 6. Please clarify what you are going for with that. And of course you will need to serve a formal 30(b)(6) notice, and do so promptly so that Defendants can object if necessary and the parties can meet and confer about the topics. On that subject, I asked you several times to confirm whether the topics for Universal and Macmillan have changed at all since your prior notices and have not heard back. Please let us know about that by the end of the day – if we don't hear, we will assume they are the same.

Thanks,
Ben

From: Mark Passin <mark@csrlawyers.com>
Date: Friday, February 3, 2023 at 3:09 PM
To: Benjamin Halperin <BHalperin@cdas.com>
Cc: Paul V. LiCalsi - Reitler Kailas & Rosenblatt LLC (plicalsi@reitlerlaw.com)
<plicalsi@reitlerlaw.com>, Van Benthysen, Brett <bvanbenthysen@reitlerlaw.com>, Lance Koonce <lance.koonce@klarislaw.com>, Zach Press <zach.press@klarislaw.com>, Nancy Wolff <NWolff@cdas.com>, CeCe Cole <CCole@cdas.com>
Subject: RE: Deposition scheduling

External Email

Ben,

I have a deposition in another case on February 23 that I thought was settling, but now may not. I will send you a different proposed date later today or on Monday. Sorry!

From: Mark Passin

Sent: Wednesday, February 1, 2023 7:02 PM

To: Benjamin Halperin <BHalperin@cdas.com>

Cc: Paul V. LiCalsi - Reitler Kailas & Rosenblatt LLC (plicalsi@reitlerlaw.com) <plicalsi@reitlerlaw.com>; Van Benthysen, Brett <bvanbenthysen@reitlerlaw.com>; Lance Koonce <lance.koonce@klarislaw.com>; Zach Press <zach.press@klarislaw.com>; Nancy Wolff <NWolff@cdas.com>; CeCe Cole <CCole@cdas.com>

Subject: RE: Deposition scheduling

Ben,

Set forth below is a **tentative** deposition schedule:

1. February 22	Ellen Brescia	Zoom
2. February 23	Mary McCauley	Zoom
3. February 24	Lynn Van Stouwe	Zoom
4. February 27	Universal	Los Angeles
5. March 1	Carrie Pestritto	Zoom
6. March 3	Stacy Abrams	Zoom
7. March 6	Wolff	Austin
8. March 7	Trent Bear	Austin
9. March 8	Entangled	Austin
10. March 10	Pelletier	Austin
11. March 13	Kim	New York
12. March 15	Macmillan	New York

As for Lynne, [REDACTED]

[REDACTED] Thus, you will need to take her deposition in Santa Barbara or by Zoom. I will send you the 30(b)(6) designations on Monday.

As I explained, the schedule is like a house of cards. If Macmillan cannot appear the week of the March 13, I will have to rearrange the entire schedule. Lastly, I would be amenable to possibly taking depositions on a weekend, if necessary.

Best regards.

Best regards.

From: Benjamin Halperin <BHalperin@cdas.com>
Sent: Tuesday, January 31, 2023 6:50 PM
To: Mark Passin <mark@csrlawyers.com>
Cc: Paul V. LiCalsi - Reitler Kailas & Rosenblatt LLC (<plicalsi@reitlerlaw.com>); Van Benthysen, Brett <bvanbenthysen@reitlerlaw.com>; Lance Koonce <lance.koonce@klarislaw.com>; Zach Press <zach.press@klarislaw.com>; Nancy Wolff <NWolff@cdas.com>; CeCe Cole <CCole@cdas.com>
Subject: Re: Deposition scheduling

Mark, nobody wants to fight, but let's be clear about what is happening here. We have asked you to confirm as many dates as you are able to and you are refusing and telling us that you can't confirm any dates at all until you know about Macmillan. It appears that you have already created a complete schedule of your own, but won't even share that with us or provide even some dates so that we can begin planning. This makes it impossible for us to work with you on scheduling. Perhaps if we saw your proposed schedule we could better understand why everything seems to hang on Macmillan's availability, which just doesn't seem plausible from where we sit. Also, if it turns out that the schedule you created but are refusing to share does not work for everyone, you will not be in a good position to seek another extension when we have been trying to work with you to schedule depositions since the 17th.

Again, not trying to fight, but scheduling depositions is a two-way street and it is unreasonable to just refuse to engage with us while we await further info from Macmillan.

From: Mark Passin <mark@csrlawyers.com>
Date: Tuesday, January 31, 2023 at 8:55 PM
To: Benjamin Halperin <BHalperin@cdas.com>
Cc: Paul V. LiCalsi - Reitler Kailas & Rosenblatt LLC (<plicalsi@reitlerlaw.com>); Van Benthysen, Brett <bvanbenthysen@reitlerlaw.com>; Lance Koonce <lance.koonce@klarislaw.com>; Zach Press <zach.press@klarislaw.com>; Nancy Wolff <NWolff@cdas.com>; CeCe Cole <CCole@cdas.com>
Subject: RE: Deposition scheduling

External Email

Ben,

I do not want to fight with you. You do not understand. If Macmillan can't do that week, I will have to somehow rearrange the entire schedule. Thus, it makes no sense to send you any dates until I know the status of Macmillan.

Thanks.

From: Benjamin Halperin <BHalperin@cdas.com>
Sent: Tuesday, January 31, 2023 5:51 PM
To: Mark Passin <mark@csrlawyers.com>
Cc: Paul V. LiCalsi - Reitler Kailas & Rosenblatt LLC (<plicalsi@reitlerlaw.com>);

Van Benthysen, Brett <bvanbenthysen@reitlerlaw.com>; Lance Koonce <lance.koonce@klarislaw.com>; Zach Press <zach.press@klarislaw.com>; Nancy Wolff <NWolff@cdas.com>; CeCe Cole <CCole@cdas.com>

Subject: Re: Deposition scheduling

Mark, we provided these windows on January 17. You have asked for extension after extension to confirm deposition dates and are now claiming that you cannot possibly confirm *any* dates for *any* depositions in this case until we let you know about one witness, which is absurd. You can at least lock in dates for your client and other Plaintiff witnesses and confirm at least some Defendant witness dates to get the process moving. Scheduling depositions in litigation isn't a house of cards that crumbles just because one witness can't yet be confirmed. The unreasonableness here is one-sided.

So again, per my email below, please give us dates for (1) Plaintiff, Baer, and McCauley, and (2) defense witnesses other than Macmillan. As I have told you now three times, we will continue to follow up with Macmillan regarding whether March 14 or 15 will work and let you know soon as we hear. Also please confirm whether your 30(b)(6) topics are the same as previously noticed, as we have now asked about that several times as well. Thanks.

From: Mark Passin <mark@csrlawyers.com>

Date: Tuesday, January 31, 2023 at 7:18 PM

To: Benjamin Halperin <BHalperin@cdas.com>

Cc: Paul V. LiCalsi - Reitler Kailas & Rosenblatt LLC (<plicalsi@reitlerlaw.com>)

<plicalsi@reitlerlaw.com>, Van Benthysen, Brett <bvanbenthysen@reitlerlaw.com>, Lance Koonce <lance.koonce@klarislaw.com>, Zach Press <zach.press@klarislaw.com>, Nancy Wolff <NWolff@cdas.com>, CeCe Cole <CCole@cdas.com>

Subject: RE: Deposition scheduling

External Email

Why the attitude? I am trying to accommodate your clients' schedules. I did not send you a snarky e-mail when you sent me the below e-mail. You know that I am waiting for you. As soon as you get back to me, I can send you a proposed schedule.

Best regards.

From: Benjamin Halperin <BHalperin@cdas.com>

Sent: Tuesday, January 31, 2023 4:10 PM

To: Mark Passin <mark@csrlawyers.com>

Cc: Paul V. LiCalsi - Reitler Kailas & Rosenblatt LLC (<plicalsi@reitlerlaw.com> <plicalsi@reitlerlaw.com>; Van Benthysen, Brett <bvanbenthysen@reitlerlaw.com>; Lance Koonce <lance.koonce@klarislaw.com>; Zach Press <zach.press@klarislaw.com>; Nancy Wolff <NWolff@cdas.com>; CeCe Cole <CCole@cdas.com>

Subject: Re: Deposition scheduling

Did you not read my emails? I told you twice today that we asked them and will let you know when they tell us.

Sent from my iPhone

On Jan 31, 2023, at 6:31 PM, Mark Passin <mark@csrlawyers.com> wrote:

External Email

Do you have an answer on Macmillan.

From: Benjamin Halperin <BHalperin@cdas.com>
Sent: Tuesday, January 31, 2023 1:16 PM
To: Mark Passin <mark@csrlawyers.com>; Paul V. LiCalsi - Reitler Kailas & Rosenblatt LLC (plicalsi@reitlerlaw.com) <plicalsi@reitlerlaw.com>; Van Benthysen, Brett <bvanbenthysen@reitlerlaw.com>; Lance Koonce <lance.koonce@klarislaw.com>; Zach Press <zach.press@klarislaw.com>; Nancy Wolff <NWolff@cdas.com>; CeCe Cole <CCole@cdas.com>
Subject: Re: Deposition scheduling

Mark,

Especially in light of the Court's order denying your extension request, we cannot wait any longer to schedule depositions. We will let you know whether Macmillan is available on March 14 or 15 once they tell us, but in the meantime you need to confirm whatever other dates you can. Our witnesses cannot keep holding multi-week windows open for you and everyone needs to book travel.

Also, please confirm whether both Plaintiff and Mr. Baer can be deposed in person the week of March 6, and give us the specific days to notice these depositions. Please also tell us which days before March 15 Ms. McCauley is available for her Zoom deposition. We may just notice these depositions for dates of our choosing if you don't tell give us dates by Thursday.

If it would be productive to share your current proposed schedule for all depositions with us, please do that.

Thanks,
 Ben

From: Benjamin Halperin <BHalperin@cdas.com>
Date: Tuesday, January 17, 2023 at 4:21 PM
To: 'mark@csrlawyers.com' <mark@csrlawyers.com>, Paul V. LiCalsi - Reitler Kailas & Rosenblatt LLC (plicalsi@reitlerlaw.com) <plicalsi@reitlerlaw.com>, Van Benthysen, Brett <bvanbenthysen@reitlerlaw.com>, Lance Koonce <lance.koonce@klarislaw.com>, Zach Press <zach.press@klarislaw.com>, Nancy Wolff <NWolff@cdas.com>, CeCe Cole <CCole@cdas.com>
Subject: Deposition scheduling

Mark,

Hope you are doing well and had a nice weekend. I'm writing to try to get the ball rolling on scheduling depositions. Below are available dates for the defense witnesses we represent. You had previously raised the idea of holding Plaintiff's deposition in person in Austin during the same week as Ms. Wolff's and Ms. Pelletier's depositions. We are

amenable to that and would propose doing it the week of March 6, except ideally not March 10. Will that work for you?

Otherwise please see our witnesses' available dates below. Please provide same for Plaintiff, Ms. McCauley (Zoom), and Trent Baer. As to Mr. Baer, we would be amendable to deposing him in person during the week in Austin if that is acceptable to your side.

Tracy Wolff (Austin) – 2/27-3/1, 3/6-3/9
Liz Pelletier (Austin) – 3/1-3/10
Stacy Abrams (Chicago area) – 2/27-3/10
Universal rep (LA) – 2/27-3/10
Macmillan rep (NYC) – 2/27-3/10

Please let us know ASAP about dates for these depositions, and whether you will be conducting any depositions remotely, so that we can begin booking travel.

Finally, please confirm that the topics for your 30(b)(6) deposition notices of Universal and Macmillan stand as they were noticed in December.

Thanks,

Benjamin Halperin he/him
Counsel
bhalperin@cdas.com

Cowan DeBaets Abrahams & Sheppard LLP
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New York, New York 10010
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